

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., minor child, and Mr. A., his father;  
and E.A.Q.A., minor child, and Mr. Q., his  
father,

*Plaintiffs,*

v.

United States of America,

*Defendant.*

Civil Action No. 5:21-cv-00469

**STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME**

Plaintiffs filed this action under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b)(1), 2671, *et seq.*, and Alien Tort Statute, 28 U.S.C. § 1350, on February 1, 2021.

Defendant United States filed a Motion to Dismiss on April 26, 2021.

Plaintiffs' time to respond to the motion is currently May 10, 2021.

Plaintiffs request a 60-day extension for filing of their response, up to and including July 9, 2021. Defendant consents to this request.

Dated: May 6, 2021

Respectfully submitted,

/s/ Veronica Finkelstein  
VERONICA J. FINKELSTEIN  
Assistant United States Attorney

/s/ Karen L. Hoffmann  
Karen L. Hoffmann  
SYRENA LAW  
128 Chestnut Street, Suite 301A

*Counsel for the United States of  
America*

Philadelphia, PA 19106

*Counsel for Plaintiffs*

**SO ORDERED:**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. EDWARD G. SMITH  
*Judge, United States District Court*

**CERTIFICATE OF SERVICE**

I, Karen Hoffmann, certify that on May 6, 2021, I served a copy of the Stipulation and Proposed Order for Extension of Time on all parties by CM/ECF.

Date: May 6, 2021

/s/ Karen L. Hoffmann

Karen L. Hoffmann

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*Counsel for Plaintiffs*